

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

DEC 28 2020

David J. Bradley, Clerk of Court

NACHAIYA KAMA

Plaintiff,

vs.

TIRR MEMORIAL HERMANN,

Defendant.

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C.A. No. 4:19-cv-04682

(JURY TRIAL DEMANDED)

**MOTION FOR PROTECTIVE ORDER, MOTION TO QUASH, AND OBJECTION TO
NOTICE OF DEPOSITION**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Comes now, Nachaiya Kama, Plaintiff in the above-captioned cause, files this Motion for Protective Order, Motion to Quash and Objection to Notice of Deposition and in support thereof states the following:

- A. The Defendant's counsel(s) on record again failed to obey and comply with the court **ORDER** for the third (3rd) time as this Honorable Court **ORDERED** on Monday, December 14, 2020. To date (Monday, December 28, 2020) Plaintiff Kama has not yet received documents/responses from the Defendants counsel(s) on record that was due on December 24, 2020. Instead, the Defendants counsel generates irrelevant arguments and not stating what is relevant in the subject matter.
- B. On December 9, 2020, the Defendant's counsel(s) did not respond to (Dkt 39) but instead retaliated and filed a Motion to Compel Plaintiff Kama to their premises (all in bad faith). The defendant's counsel now files and responds to (Dkt 39) without support.
- C. The Defendants counsel(s) again drafts another proposed order to be granted by presenting another deceitful agenda in a good light to manipulate the court's decision.
- D. The Defendant's counsel(s) Notice is abusive and intimidating.
- E. The Defendant's counsel(s) filing (Dkt 51) on December 24, 2020, without putting Plaintiff Kama in the copy of which is questionable.

- F. The Defendant's counsel(s) denies its ulterior motives before this Honorable Court. Time will tell.
- G. The Defendant's counsel(s) are aware of ALL the responses and documents to produce.
- H. Plaintiff Kama has been subjected to several abuses from Defendant's counsel and this Honorable court is my witness as it is evident from previous filings; Plaintiff Kama endured and did not complain up until December 7, 2020. Why should an American citizen be subjected to such abuse? It is evident in (Dkt 35) filed On October 1, 2020, that Plaintiff Kama was subjected to being oppressed, unduly burdened, vexed, and harassed; if not Plaintiff Kama will not ask this Honorable Court for an extension of time when Plaintiff Kama did not get any response from the Defendants counsels on record.
- I. Plaintiff Kama objects to Defendant's counsel(s) arguments:
 - a. Plaintiff Kama (*Pro Se*) did not fail and it's clearly not a miscommunication as the Defendant's counsel(s) on record claims or deceives the Court to get the signature on paper.
 - b. Plaintiff Kama does not wish and is not willing to meet and confer as Defendant's counsel deceitful states to manipulate the court's decision.
 - c. Plaintiff Kama choose to communicate via email as it's the best way she chooses to communicate with the Defendants counsel(s) on record.
 - d. Plaintiff Kama has proven in the previous filing that she has complied to Discovery to the best of her ability as a layman and this Honorable court is a witness as it is evident from previous filings.
 - e. Plaintiff Kama Object as it is not a conclusory statement, Plaintiff Kama stated the facts. See (Dkt 48). Plaintiff Kama objects to violating any rule. The Defendant's counsel(s) on the record are the ones with a license/in practice and in clear violation in disregarding court ORDERS evidently as mention in Section A. I am just a *Pro Se*; a layman.
 - f. Plaintiff Kama objects to Defendant's counsel's claim as I complied to the best of my ability and made efforts otherwise how did the discovery get this far. Plaintiff Kama communicated as it is evident from some of the Exhibits that the Defendant's counsel filed to the court (See Dkt 46). Plaintiff Kama responds when necessary and if I don't have anything to say or don't know how to respond I remain silent

and if I am dissatisfied, I respond to the best of my ability as a layman to perfection and for clarity as I am not above learning.

- g. Defendant's counsel on the record is in clear violation; especially **42 U.S. Code 1983**.

Plaintiff Kama respectfully moves this Honorable Court to quash (Dkt 51) and all therein and enter a protective order prohibiting the Defendant's counsel(s) on record against taking advantage and abuse. In regards to one of the subject matter(s) in this suit, Plaintiff Kama refuses to be subjected to any form of harassment by Defendant's counsels on record of which is affecting Plaintiff Kama's mental stability due to traumatic stress. I no longer wish to be desposed and advance to trial, since on countless times the Defendant's counsel have chosen to disappoint and disrespect the plan of discovery.

Respectfully Submitted,

Date: December 28, 2020



Plaintiff Kama. (Pro Se)